



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII, MONTANA OFFICE  
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096  
HELENA, MONTANA 59626-0096

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EC-2

Ref: 8MO

November 6, 1997

Ms. Debbie L. R. Austin  
Forest Supervisor  
Beaverhead-Deerlodge National Forest  
420 Barrett Street  
Dillon, Montana 59725

Re: Beaverhead Forest Plan  
Riparian Amendment Final  
Environmental Impact Statement

Dear Ms. Austin:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) reviewed the above-referenced Final Environmental Impact Statement (FEIS).

The EPA supports the goal of the Forest Service to improve currently degraded riparian areas through amendment of the Forest Plan to add a goal and measurable objectives for riparian function that will provide direction for future Forest Service projects to improve grazing management. The EPA has several comments and concerns regarding the Forest Service's preferred alternative, Alternative 7, as identified below:

1. Thank you for revising the language describing the desired future condition for lotic systems to clarify and/or assure that water quality standards compliance be included within the proposed desired future condition for riparian areas.

We also thank you for incorporating into Alternative 7, Forest Plan monitoring, assessment of chemical and biological conditions in appropriate circumstances.

2. We continue to believe that it would have been helpful to add water quality protection language to the objectives. For example, amending the second paragraph under the domestic livestock objective to:

"Domestic livestock grazing will be managed and may be limited in riparian areas to ensure riparian function and water quality are maintained or restored."



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3. It is stated on page A-47 that, "while permittees comply with the interim standard, no permanent changes will be made to adjust stocking levels." We are concerned that the interim standards may not adequately promote improvement and restoration of riparian function where existing function is degraded. We believe evaluation of the efficacy of the interim standards in restoring degraded riparian functions should be carried out. There may be situations where permanent changes to adjust stocking levels may be necessary to restore riparian function.

Interim standards should not only be designed to allow no reduction of existing riparian functions, but also to promote improvement and restoration of riparian function where there are existing degraded functions.

4. While we are pleased that actions are being taken to improve riparian management on the Forest, we are concerned that the indicated 3-5 year timeframe for establishing an upward trend in vegetation functions and the 5-10 year timeframe for establishing an upward trend in physical functions still allows long periods of degradation to remain. Even if a degraded area is in an upward trend after 5 years, many years of continued degradation may occur before proper functioning condition is actually attained.

We are particularly concerned with the language saying that it would take fifty years to achieve desired future condition with the preferred alternative. If this meant long-term non-compliance with water quality standards (i.e., continued impairment of beneficial stream uses) it would be unacceptable. We believe that more timely attainment of desired future condition should be established as a goal. The 10 year timeframe for developing Total Maximum Daily Loads (TMDLs) on impaired streams seems more reasonable.

5. We also remain concerned with the flexibility and wide latitude that would be allowed in choosing allowable use guidelines. We are concerned that this flexibility and latitude may be used to further avoid and/or delay changes in grazing management that will in turn delay attainment of standards and restoration of degraded areas, given the likely pressure exerted by permittees to maintain and increase stocking rates. Actual improvement of water quality in impaired streams, and restoration of riparian function in degraded riparian areas should be given priority.
6. It is not clear why the Fisheries Objective Alternative 7, would delete the Fisheries objective sentence beginning with "For example, domestic livestock grazing...." (page A-39). It would appear that this sentence helps provide a means of measuring progress at achieving the fisheries goal. If this sentence is removed we believe it should be replaced with




an alternative means of measuring progress to achieve the fisheries objectives.

7. Finally, it is not clear to us why the Forest Plan has a goal that, "provides opportunities for use of forage by domestic livestock at or above current permitted levels of use while protecting or enhancing fishery habitat, riparian areas, recreation and other forest resources" (Goal #6, FEIS page III-1). Does this preclude reductions in forage use where such reductions may be necessary to protect or restore riparian functions? If riparian restoration is to be achieved in degraded areas the level of forage use by domestic livestock may in some circumstances need to be reduced below current levels. It would appear appropriate to strike the language "at or above current permitted levels of use" from this Forest Plan goal.

The EPA appreciates the opportunity to review and comment on this FEIS. If we may provide further explanation of our concerns please contact Mr. Steve Potts of my staff in Helena at (406) 441-1140 ext. 232. Thank you for the opportunity to comment.

Sincerely,

  
John F. Wardell  
Director  
Montana Office

cc: Cindy Cody, EPA, 8EPR-EP, Denver  
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